

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Advanced Methods to Target and Eliminate	)	CG Docket No. 17-59
Unlawful Robocalls - Petition for	)	
Reconsideration and Request for Clarification	)	
of USTelecom - The Broadband Association	)	

**Comment of Professional Association for Customer Engagement**

**Filed January 28, 2022**

Sam Falletta  
Professional Association for  
Customer Engagement  
7230 Arbuckle Commons, #101  
Brownsburg, Indiana 46112

Michele A. Shuster, Esq.  
Joshua O. Stevens, Esq.  
Mac Murray & Shuster LLP  
6525 West Campus Oval, Suite 210  
New Albany, Ohio 43054

***Chairperson of Professional Association for  
Customer Engagement***

***Counsel for Professional Association for  
Customer Engagement***

## **I. Introduction**

The Professional Association for Customer Engagement (“PACE”)<sup>1</sup> submits these comments in response to the Federal Communications Commission’s (“Commission”) Sixth Further Notice of Proposed Rulemaking (“the Notice”).<sup>2</sup> The Commission seeks comments on the phasing-out of SIP Code 603 and the full implementation of SIP Codes 607 and 608 for purposes of providing immediate notification to callers that their calls have been blocked as required under the Call Blocking Fourth Report and Order (“Fourth Report”).<sup>3</sup> Specifically, the Notice requests comments regarding: (1) whether SIP code 603 provides adequate notification to callers, (2) whether the Commission should set a firm deadline for full implementation of codes 607 and 608, (3) when this deadline should be, and (4) how to encourage standards bodies to finalize a transition to 607 and 608 by that deadline.<sup>4</sup>

## **II. SIP Code 603 is an inadequate form of notification to callers**

SIP Code 603 informs the caller that their call has been “decline[d].”<sup>5</sup> A 603 code is sent when the “callee’s machine was successfully contacted, but the user explicitly does not wish to or cannot participate.”<sup>6</sup> This allows a call recipient to block a call without transmitting a reason for doing so.<sup>7</sup>

---

<sup>1</sup> PACE is the only non-profit organization dedicated exclusively to the advancement of companies that use a multi-channel contact center approach to engage their customers, both business-to-business and business-to-consumer. These channels include telephone, email, chat, social media, web, and text. Our membership is made up of Fortune 500 companies, contact centers, BPOs, economic development organizations, and technology suppliers that enable companies to contact or enhance contact with their customers.

<sup>2</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls - Petition for Reconsideration and Request for Clarification of USTelecom - The Broadband Association*, CG Docket No. 17-59, Order on Reconsideration, Sixth Further Notice of Proposed Rulemaking, and Waiver Order (released Dec. 14, 2021).

<sup>3</sup> *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-69, Fourth Report and Order, 35 FCC Rcd .15221, paras. 48-78 [hereinafter *Fourth Report*] (to be codified at 47 CFR § 64.1200(k)(8)-(10)).

<sup>4</sup> See Notice at 18-19.

<sup>5</sup> *Integrated Service Digital Network (ISDN) User Part (ISUP) to Session Initiation Protocol (SIP) Mapping*, INTERNET ENGINEERING TASK FORCE (Dec. 2002), <https://tools.ietf.org/html/rfc3398>.

<sup>6</sup> SIP: Session Initiation Protocol, INTERNET ENGINEERING TASK FORCE (2002), <https://datatracker.ietf.org/doc/html/rfc3261#section-21.6.2>.

<sup>7</sup> *SIP: Session Initiation Protocol*, INTERNET ENGINEERING TASK FORCE (2002), <https://datatracker.ietf.org/doc/html/rfc3261#section-21.6.1>.

It is this uncertainty contained in a 603 blocking notification that warrants transition to 607 and 608. SIP Code 607 “is used when the called party indicates a call is unwanted”<sup>8</sup> and SIP Code 608 “indicates a call was rejected by an intermediary, with the initial use case being calls rejected by an analytics engine, as opposed to by the called party.”<sup>9</sup> Both codes provide a level of detail superior to that of Code 603. In fact, the Commission has promoted this view, stating that ISUP Code 21, which is analogous to SIP Code 603,<sup>10</sup> “does not provide the same level of detail as either SIP Code 607 or 608, and may be used in other contexts as well.”<sup>11</sup> If the purpose of the transmission of a SIP Code in this context to a caller is to facilitate corrective procedures after mistaken call blockage, a more particularized SIP Code (i.e., 607 or 608) will give a caller a running-start in remedying the situation. For this reason, the Commission should advance its pronouncement in the Fourth Report “that terminating voice service providers that block calls on an IP network return SIP Code 607 or 608, as appropriate.”<sup>12</sup>

### **III. The Commission should set a deadline for use of SIP Codes 607 and 608**

In order to assist callers in investigating blocked calls, we request that the Commission set a deadline for the implementation of SIP Codes 607 and 608, and that this deadline fall on a date no later than sixth months after the original January 1, 2022 deadline established in the Fourth Report.<sup>13</sup> We agree that with the Commission that SIP Code 603 may be used as an “interim measure” prior to this deadline.<sup>14</sup> However, while the Commission has affirmed that “nothing in [The] [O]rder prohibits a voice service provider from using SIP Codes 607 and 608 to meet its immediate notification obligations[,]” we implore the commission to require that those providers who already possess the capability to transmit 607 and 608 immediately cease

---

<sup>8</sup> Fourth Report at 20, n. 132.

<sup>9</sup> *Id.*

<sup>10</sup> *Default SIP-to-SS7 ISUP Cause Codes*, DIALOGIC CORPORATION (2010), [https://www.dialogic.com/webhelp/img1010/10.5.2/webhelp/General\\_Reference/def\\_sip-ss7\\_cc.htm](https://www.dialogic.com/webhelp/img1010/10.5.2/webhelp/General_Reference/def_sip-ss7_cc.htm). The *Fourth Report* states that the Internet Engineering Task Force recommends “ISUP Code 21 be mapped to either SIP Code 403 ‘Forbidden’ or, where the cause location is ‘user,’ SIP Code 603, ‘Decline’ . . . .” *Fourth Report* at 21 n. 135.

<sup>11</sup> Fourth Report at 20-21, n. 132.

<sup>12</sup> *Id.* at 20, para. 56.

<sup>13</sup> *See* Notice at 4.

<sup>14</sup> *Id.* at 9.

transmitting Code 603. This measure will accomplish the stated goal of providing clarity and expediting the dispute resolution process,<sup>15</sup> while also familiarizing callers with the two new codes. Although the Commission nullified the original deadline, its reasoning was that “implementing SIP Codes 607 or 608 by January 1, 2022 appears infeasible.”<sup>16</sup> For those providers who can currently transmit—and could have transmitted at the beginning of the year—SIP Codes 607 and 608, this “infeasibility” is irrelevant.

#### **IV. Conclusion**

Many callers, including PACE members, continue to see significant reductions in completed calls that are likely the result of erroneous call blocking. Rapid implementation of SIP Codes 607 and 608 will assist such callers in identifying when their calls have been blocked, why they have been blocked, and begin the dispute resolution process as needed. PACE appreciates the opportunity to submit these comments and encourages the Commission to order timely implementation of SIP Codes 607 and 608.

---

<sup>15</sup> See *id.* at 4, para. 6, 7, para 14.

<sup>16</sup> *Id.* at 7, para. 15.